

**IN THE  
UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
	)	
v.	)	No. 17 CR 442
	)	Judge Elaine E. Bucklo
STEVEN MILLER,	)	
Defendant.	)	
	)	

**AGREED MOTION TO TRAVEL**

STEVEN MILLER, by the Federal Defender Program and its attorney IMANI CHIPHE, respectfully moves this Court to modify the order setting conditions of bond to permit him to travel to Southbend, Indiana. In support of this motion the defendant states as follows:

1. Mr. Miller was arraigned and entered a plea of not guilty to an information alleging violations of 18 U.S.C. §1343. Mr. Miller was released on an unsecured bond. As a condition of his bond Mr. Miller is not allowed to travel out the Northern District of Illinois without the Court's permission.
2. Mr. Miller requests permission to travel to Southbend, Indiana for a family weekend trip from July 29, 2017 to July 30, 2017.

3. The Pretrial Services Officer assigned to this case, Victor Alvarez, does not object to this request. In addition, Mr. Miller has provided Mr. Alvarez with an itinerary for his trip.

4. Counsel has contacted the Assistant United States Attorney assigned to this case, Renai Rodney, and he does not object to this request. Therefore, this motion is unopposed.

WHEREFORE, for all the reasons stated herein, Mr. Miller respectfully requests that this Court grant his motion and permit him to travel to Southbend, Indiana.

Respectfully submitted,

FEDERAL DEFENDER PROGRAM  
Carol A. Brook  
Executive Director

By: Imani Chiphe  
Imani Chiphe  
*Attorney for Steven Miller*

IMANI CHIPHE  
FEDERAL DEFENDER PROGRAM  
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**CERTIFICATE OF SERVICE**

The undersigned, Imani Chiphe, an attorney with the Federal Defender Program hereby certifies that in accordance with FED. R.CIV.P5,LR5.5, and the General Order on Electronic Case Filing (ECF), the following documents(s):

**AGREED MOTION TO TRAVEL**

Was served pursuant to the district court's ECF system as to ECF filing, if any, and were sent by first- class mail/ hand delivery on **July 27, 2017**, to counsel/ parties that are non-ECF filers.

By: s/ Imani Chiphe  
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